TECHNICAL REVIEW: Oil and Gas Checklist

Permit No.:	177445	Company Name:	Burk Royalty Co., Ltd.	APD Reviewer:	Ms. Briannah Spooner
Project No.:	379430	Unit Name:	Mobil-Givan	PBR No(s).:	106.352 2012-NOV-22

GENERAL INFORMATION									
Regulated Entity No.: RN110253655 Date Received by TCEQ: September 6, 2024									
Customer Reference No.:	CN600994396	Date Received by Reviewer:	September 9, 2024						
City/County:	Meadow, Terry County	Physical Location:	FROM THE INTERSECTION OF US HWY 385 & CR 200, TRAVEL EAST ON CR 200 FOR 4.0 MI. TURN LEFT ONTO LEASE ROAD. TRAVEL 0.3 MI. ARRIVE AT FACILITY ON RIGHT.						

CONTACT INFORMATION					
Responsible Official/ Primary Contact Name and Title:	Mr. Clayton Scott Operations Manager	Phone No.: Fax No.:	(936) 219-0686	Email:	clayton@burkroyalty.com
Technical Contact/ Consultant Name and Title:	Mr. Clayton Scott Operations Manager	Phone No.: Fax No.:	(936) 219-0686	Email:	clayton@burkroyalty.com

GENERAL PROJECT INFORMATION		NO	COMMENTS
Is confidential information included in the application?		Х	
Are there affected NSR or Title V permits for the project?		Х	
Are there permit limits on using PBRs at the site?		Х	
Is PSD or Nonattainment netting required?		Х	
Has the fee been paid?	Х		720237 / 582EA000624410
Was an impacts evaluation required for the project?		Х	
Have MSS emissions been accounted for in site-wide totals?		Х	MSS is being claimed under 106.359
Site Specific Analysis used?		Х	Representative analyses meet TCEQ criteria; H_2S site specific
Are all vents \geq 20 ft, and meet 352(l)(4) as applicable?	Х		All vents > 20 ft

Compliance History Evaluation - 30 TAC Chapter 60 Rules						
A compliance history report was reviewed on:	September 9, 2024					
Site rating & classification:	N/A					
Company rating & classification:	0.00 / High					

PROJECT RULES	How was rule compliance demonstrated? (i.e., checklist, rule language, etc.)
106.352	106.352 checklist provided

DESCRIBE THE OVERALL PROCESS AT THE SITE

The Mobil-Givan is a sour natural gas and condensate/crude oil production facility located in Terry County, Texas.

Separation

Production from the wells flows to an unfired treater. The natural gas from the treater is sent to a sales pipeline. Condensate/crude oil flows to the Oil Storage Tank and produced water flows to the Water Storage Tanks.

Condensate/Crude Oil Storage and Load Out

Condensate/crude oil is stored in one (1) 500 bbl Oil Storage Tank (EPN: OST-01). Flash, standing, and working losses are routed to the atmosphere. The stored condensate/crude oil is then shipped via trucks to sales. Volatile Organic Compounds (VOCs) emissions resulting from the Tank Truck Oil Loading Facility (EPN: OIL-LD-01) are vented to the atmosphere. The facility handles condensate/crude oil prior to lease custody transfer.

Produced Water Storage and Disposal

Produced water is stored in one (1) 500 bbl and one (1) 200 bbl Water Storage Tanks (EPNs: WST-01 and WST-02). Flash, standing, and working losses are routed to the atmosphere. The stored produced water is then shipped via pipeline to saltwater disposal.

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DESCRIBE THE PROJECT

Burk Royalty Co., Ltd. is submitting an application to certify their site and emissions under 106.352(I) using a PI-7-CERT.

FEDERAL STANDARDS APPLICABILITY							
Applicable Rule(s) :	Y	NA	Explanation of how it meets (if applicable), or why it isn't applicable:				
NSPS Subpart OOOOa		×	The facility was constructed prior to August 23, 2011. As an older site established before subpart OOOO, the site operated as a claimed PBR, not requiring authorization until recently, sour gas was present. Since the site now handles sour gas, it is now being authorized with a PI-7-CERT.				
NSPS Subpart OOOOb		х	The facility was constructed prior to December 6, 2022. As an older site established before subpart OOOO, the site operated as a claimed PBR, not requiring authorization until recently, sour gas was present. Since the site now handles sour gas, it is now being authorized with a PI-7-CERT.				

SITE INFORMATION		
What is the Natural Gas Throughput?	3,650	MMSCF/day
What is the Oil/Condensate Throughput?	5,475	bbl/day
What is the Produced Water Throughput?	146,000	bbl/day
Site specific H2S content of inlet gas (ppm)	26,345.80	ppm
If sour, provide distance (ft.) to nearest off property receptor.	3,700	ft.

Equipment: # of each		Calculation Methodology
Storage Tanks	1 oil, 2 water	AP-42, Chapter 7
Separators	Υ	
Truck Loading	Υ	AP-42, Chapter 5, Section 5.2-4
Fugitives	Υ	TCEQ Guidance
MSS	Y	MSS is being claimed under 106.359

MAXIMUM ALLOWABLE EMISSION RATES TABLE (MAERT)														
EPN / Emission Source	VO	C	NO	x	CO)	PM/PM ₁₀	/ PM _{2.5}	SO	2	H ₂ S	5	HAPs	
	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy
FE-01 / Fugitive Emissions	0.46	2.03									0.01	0.04		
OIL-LD-01 / Tank Truck Crude/Condensate Loading Losses	18.34	0.26									<0.01	<0.01		
OST-01 / Oil Storage Tank	0.90	3.92									< 0.01	< 0.01	0.17	0.74
WST-01 / Water Storage Tank	0.08	0.37									< 0.01	< 0.01	0.02	0.07
WST-02 / Water Storage Tank	0.03	0.12									< 0.01	< 0.01	0.01	0.02
TOTAL EMISSIONS (TPY):		6.70										0.04		0.83
MAXIMUM OPERATING SCHEDULE: Hours/Year 8,760														

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	TECHNICAL REVIEWER	PEER REVIEWER	FINAL REVIEWER	
SIGNATURE:	Briannah Spooner	Joshura Wheatley	Michael Patu	
PRINTED NAME:	Briannah Spooner	Joshua Wheatley, Team Leader	Michael Partee, Manager	
DATE:	E: September 18, 2024		September 18, 2024	